

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

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DURACELL U.S. OPERATIONS, INC.,	: 1:19- Civ. 03820
A Delaware Corporation	:
Plaintiff,	: STIPULATION TO EXTEND
	: TIME FOR DEFENDANT TO
	: RESPOND TO PLAINTIFF'S
	: <u>COMPLAINT</u>
	:
against	:
MY IMPORTS USA LLC, a New Jersey Limited	:
Liability Company, MY IMPORT USA INC., a New	:
Jersey Corporation, MANSUR MAQSUDI (a/k/a	:
Mansur Maq), an individual, JIAN YANG ZHANG	:
(a/k/a Kevin Zhang), an individual;	:
	:
Defendant(s).	:
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IT IS HEREBY STIPULATED by and between the parties hereto through their respective attorneys that Defendant Jian Yang Zhang's (a/k/a Kevin Zhang) ("Defendant Zhang") time to answer or otherwise respond to Plaintiff's complaint shall be extended from July 1, 2019 to July 31, 2019 as the parties continue to engage in informal discovery in a good faith effort to resolve this matter.

Although this is the second request for an extension herein, good cause exists for this further extension as counsel for defendant Zhang had just recently been retained at the time of the first request and since that time, counsel for plaintiff and Defendant Zhang have been actively engaged in good faith discussions concerning informal discovery and potential resolution of the matter prior to filing an answer.

This document is being electronically filed through the Court's ECF System. In this regard, counsel for Defendant Zhang hereby attests that (1) this is the second request for an extension; (2) the content of this document is acceptable to all persons required to sign the

document; (3) Plaintiff's counsel has concurred with the filing of this document; and (4) a record supporting this concurrence is available for inspection or production if so ordered.

Respectfully Submitted,

LAW OFFICES OF MICHAEL V. CIBELLA, LLC

DATED: June 26, 2019

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REED SMITH LLP

DATED: June 26, 2019

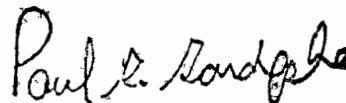
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ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED. Defendant Jian Yang Zhang (a/k/a Kevin Zhang) shall answer or otherwise respond to Plaintiff's complaint on or before Wednesday, July 31, 2019.

Dated: 7/1/19



JUDGE PAUL G. GARDEPHE
UNITED STATES DISTRICT COURT